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**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

*In re:*

**PILGRIM MEDICAL CENTER, INC.,  
AND NICHOLAS V. CAMPANELLA,**  
  
Debtor.

Case No. 16-15414 (VFP)  
(Jointly Administered)  
Chapter 11  
Hon. Judge: Vincent F. Papalia  
*Oral Argument Not Requested*

**APPLICATION FOR ORDER SHORTENING TIME FOR AND  
LIMITING NOTICE OF HEARING ON DEBTOR IN POSSESSION'S  
MOTION TO APPROVE SETTLEMENT PURSUANT TO FEDERAL  
RULE BANKRUPTCY PROCEDURE 9019(a)**

TO: HONORABLE VINCENT F. PAPALIA  
UNITED STATES BANKRUPTCY JUDGE

Pilgrim Medical Center, Inc. and Nicholas V. Campanella (collectively, the “Debtors”), the chapter 11 debtors and debtors-in-possession, by and through their respective counsel hereby submit this application (the “Application”) for an order shortening the time for the hearing on Debtors’ motion for entry of an order approving a compromise and settlement by and among the

Debtors and the Plaintiffs<sup>1</sup> pursuant to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 9019; and granting other and related relief (the “Motion”). In support of this Application, Debtors respectfully states as follows:

### **BACKGROUND**

1. The captioned affiliated cases were commence substantially to resolve claims resulting from a civil action commenced by Jacqueline Jalil, Luisa Rojas and Tiana Mena (the “State Court Action”). The State Court Action resulted in a judgment in favor of the Plaintiff’s which collectively represents that largest creditor of the estate.

2. The Debtor appealed the State Court Action before the Superior Court of New Jersey, Appellate Division. Since the filing of these bankruptcy cases, the treatment of the Plaintiffs’ claims has consumed substantial time and expenses for all parties as well as the Court’s attention.

3. After attending mediation and after various negotiations, the Parties agreed to a global settlement (the “Settlement”), the details of which are more fully set forth in the Debtors’ Motion.

4. As discussed more fully in the Debtors’ supporting application to its Motion, the Debtors, in their business judgment, believe it is in the best interests of their creditors and estates to approve the Settlement with the Plaintiffs’ and to have the Motion heard on a shortened notice period to other parties in interest..

### **RELIEF REQUESTED AND REASONS THEREFOR**

5. In accordance with Fed. R. Bankr. P. 9019, the Debtors have submitted an application for an order approval of the Settlement with the Plaintiffs.

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<sup>1</sup> Capitalized terms used but not defined herein shall have the same meaning ascribed to them in the Motion.

6. The Debtors seek to approve the settlement agreement in an expedient manner with a hearing no later than **April 27, 2017**.

7. Expedient treatment of the Motion is necessary because the settlement with the Plaintiff is in the best interests of the Debtors and their creditors. The settlement will allow the Debtors to resolve the largest claims against each of their estates in an expedient fashion. Debtors submit that this Court's prompt consideration of the Motion will inure to the substantial benefit of all parties involved in this Chapter 11 case.

8. By this Application, the Debtors seek an order shortening the normal twenty-one (21) day notice period for and limiting notice of the hearing on the Motion. Specifically, the Debtors respectfully request that a hearing on approval of the Motion be scheduled for **April 27, 2017**, or as soon thereafter as the Court's schedule permits.

### **CONCLUSION**

**WHEREFORE**, the Debtors respectfully request that this Court enter the order submitted herewith reducing the time period and fixing notice of a hearing regarding the proposed settlement and granting such other and further relief as this Court deems just and equitable.

Respectfully submitted,

**SCURA, WIGFIELD, HEYER,  
STEVENS & CAMMAROTA, LLP**  
*Attorneys for Pilgrim Medical Center, Inc.*

By: /s/ David L. Stevens  
David L. Stevens

Dated: April 17, 2017

**LAW OFFICES OF JEROME M. DOUGLAS, LLC**  
*Counsel for Nicholas V. Campanella*

By: /s/ Jerome M. Douglas  
Jerome M. Douglas

Dated: April 17, 2017